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November 11, 2016

Honorable Steven C. Mannion, U.S.M.J.
United States District Court
50 Walnut Street
Courtroom 2B
Newark, New Jersey 07102

RE: Travelers Casualty Insurance Company of America, et
al. v. The Finest Construction, et al.
Docket Number: 16-cv-02450 (SDW-SCM)
Our File Number: 3-6401.042971C

Dear Judge Mannion:

This office represents 223 Walker Associates, LLC, V&R Developers, Inc. and Edgewater Gorge Road, LLC in the above captioned matter. This letter is to provide Your Honor with a brief status of the case in advance of the November 15, 2016 telephone status conference and is being submitted with consent of counsel for Plaintiff Travelers and Defendant The Finest Construction.

Discovery has been ongoing in this matter without issue amongst the parties. Depositions of representatives of Defendants The Finest Construction and 223 Walker Associates, LLC were taken during the week of September 5, 2016. Plaintiff's counsel may notice the deposition of another Finest Construction employee, Edgar Rodriguez, who is currently employed by the company.

Defense counsel have been calculating the extent of damages alleged in both the Federal and State actions and all parties are interested in pursuing a global settlement and are exploring the prospect of Mediation.

In this effort, the Court should be aware that Defendant Finest Construction's personal counsel, Leonard E. Seaman, Esq. has filed a Third-Party Complaint against Finest's insurance broker, Anderson-

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Bernard Agency, Inc. This Complaint was filed in the state court actions against the insurance broker because it failed to properly add 223 Walker Street as an additional insured, yet provided a declaration page to Finest indicating that 223 Walker was so named. Mr. Seaman intends to enter a notice of appearance and plans to file a Third-Party Complaint against the broker in the Federal action as well. We do not anticipate any objection to that filing. With our consent, Mr. Seaman intends to participate in the telephone conference with Your Honor on Tuesday, November 15, 2016.

Naming the insurance broker in the within action will require additional discovery to be exchanged and the insurance broker's deposition to take place.

Thank you for Your Honor's attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donald T. Okner", with a stylized, flowing script.

DONALD. T. OKNER

DTO:LBC

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